

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Timothy E. Edquist, Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice, hereinafter referred to as Affiant, being duly sworn under oath, hereby deposes and states as follows:

INTRODUCTION AND AGENT BACKGROUND

I am a Special Agent with the FBI, and I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7) and Federal Rule of Criminal Procedure 41(a)(2)(C), in that I am an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516. I have been employed by the FBI since September of 2008, and have been a law enforcement officer since February of 2013. I am currently assigned to the FBI’s Cleveland Division’s Akron Resident Agency, where I primarily investigate a variety of criminal matters that involve Federal violations. Additionally, I regularly work with members of the FBI’s Greater Akron Area Safe Streets Task Force. I have gained experience through training at the FBI Academy in Quantico Virginia, a variety of on the job training seminars, and from everyday work relating to conducting investigation like the one described herein. While employed by the FBI, I have investigated drug trafficking organizations, violent criminal street gangs, crimes against children, money laundering, kidnapping, wire fraud, computer intrusions, and other federal offenses. Specifically, your affiant has participated in investigations of federal criminal violations related to high technology or cybercrime, cyberstalking, extortion, child exploitation, and child pornography, also known as (aka): Child Sexual Abuse Material (CSAM).

Between Affiant's work experience and training, Affiant has either taken part in, assisted in, or received extensive training in all of the usual investigative tools and methods including (but not limited to), electronic surveillance (i.e., wire and electronic interception of cellular telephones), extraction of data from computers and cellular telephones, examination of data from computers and cellular telephones, analysis of evidence, search and arrest warrants, physical surveillance, debriefing of subjects/defendants, interviews of witnesses and cooperating persons, handling and supervising cooperating sources (whether to collect information, conducting proactive transactions/controlled buys, or conduct consensually recorded meetings/calls), and the analysis of documentation and records (such as phone records and financial records).

As will be shown below, there is probable cause to believe Andrew John **DRABIC** has engaged in conduct that is in violation of Title 18, United States Code, Section 2251(a), Attempted Sexual Exploitation of Children. This affidavit is offered in support of an arrest warrant for Andrew J. **DRABIC**, date of birth XX/XX/1989 (hereinafter, "**DRABIC**"). XXX Main Street, Ravenna, Ohio.

The statements in this affidavit are based in part on information provided by a FBI Agents using various investigative methods including, but not limited to, the issuance of Court Orders and Subpoenas, FBI employee physical surveillance, querying of law enforcement, commercial, and open-source resources and databases, collection, analysis, and review of publicly available social media platforms and websites, as well as on my investigation, and the investigations of other area law enforcement officers, of this matter. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that **DRABIC** violated 18 U.S.C. § 2251(a).

BACKGROUND ON ANDREW DRABIC AND INITIATION OF INVESTIGATION

Since 2019, numerous female victims in the Northeast Ohio area have contacted local police departments and submitted complaints about having their Snapchat accounts accessed by an unauthorized person.¹ Following the unauthorized access, several of these women had nude images or videos of themselves and/or other compromising and embarrassing material stolen from either their non-publicly viewable libraries on Snapchat or the stored images on their cell phones.² The women all received harassing text messages from an unknown person, or persons, threatening to release the images and videos if the victims did not send additional nude images or videos, also known as “nudes,” or agree to engage in some type of sexual favor. In several cases, the nude images of the victims were made publicly viewable on the internet. All the independent investigations revealed **DRABIC** being the primary suspect, and in several of the cases, common IP addresses were attributed to **DRABIC**’s ISP accounts.

While the unauthorized access is characterized as “account compromise” or “hacking” by the victims, the method **DRABIC** used to gain access is best characterized as a scam and deception scheme. **DRABIC** used social engineering techniques to identify the social media accounts and telephone numbers used by the victims. **DRABIC** then created and established numerous accounts with online telephone number provisioning services (such as TextNow and Pinger), also known as Voice over Internet Protocol (VoIP) telephone number services, using

¹ Snapchat is a popular multimedia and instant messaging app and service hosted by the United States based social media company, Snap, Inc.

² According to Snapchat Support webpage, “When a Snapchat account has been compromised (also known as ‘hacked’) it means that it’s been access by someone who is not authorized to use it.” Also, “Your Snapchat account may be compromised if you notice suspicious behavior such as: Spam sent from your account | An alert that someone logged into your account from a different location, IP address, or device | Having to continually re-log in to the app | New contacts being added to your list without your permission | The mobile number or email address associated with your Snapchat account was changed without your consent.”

fictitious email addresses to register the account. **DRABIC** repeatedly utilized various VoIP numbers for brief periods of time in order to anonymously communicate with victims via text message. **DRABIC** used specific methods to prompt security notifications in the victims' Snapchat accounts. In addition, **DRABIC** utilized common text message language, synonymous with Snapchat language, for the purpose of persuading and tricking victims into providing him with account credentials and multi-factor authentication codes, which allowed him to compromise victims' accounts.³ **DRABIC** attempted to, and at times succeeded in, obtaining victims' private Snapchat profiles including Snapchat's "My Eyes Only" subsection of users' profiles, so that he could gain access to photographs, videos, and/or other screenshot images which the users otherwise intended to remain private. **DRABIC** attempted to access these files expecting they would contain nude photographs or videos, or other personal material which could be used to blackmail or extort victims.

In 2020, investigators from several local police departments contacted the FBI Akron Resident Agency (RA) to request that the FBI consolidate the investigations involving **DRABIC** into one multijurisdictional case. In October 2020, the FBI Akron RA initiated a full investigation concerning the numerous incidents and allegations where **DRABIC** has been identified as a primary suspect.

FACTS SUPPORTING PROBABLE CAUSE

³ Based on my training and I experience I know that multi-factor authentication codes are codes sent from a company to an individual to verify their identity. For example, if multi-factor authentication is turned on for a social media platform, after the user signs in with their username and password, they will be sent the code, which they will then enter on the platform in order to access their account. These codes can be sent via text messages, emails or telephone calls. An alternate means to obtain the code is to use an authentication code application such as RSA token and Google Authenticator, which would remove the need to receive the code via text message or email.

On January 4th, 2022, federal search warrants for **DRABIC**'s person, residence and vehicle were authorized by Honorable Magistrate Judge Amanda M. Knapp, of the United States District Court for the Northern District of Ohio.

On January 12th, 2022, FBI Agents and other law enforcement investigators executed a federal search warrant on **DRABIC**'s residence located at Main Street, Ravenna, Ohio. Simultaneously, federal search warrants were executed on **DRABIC**'s person and his vehicle. Numerous computer systems, cellular telephones, storage accessories, thumb drives, and/or media drives capable of storing media were seized.

Following the execution of the search warrant of his person, **DRABIC** was interviewed by your affiant and another investigator. During the audio recorded interview, **DRABIC** told your affiant that he did employ schemes involving social engineering, fraud and deception to gain authorized access to the private Snapchat accounts of various victims.

DRABIC informed affiant he intentionally targeted these victims for the purpose of causing emotional harm by harassing and threatening them.

Further, **DRABIC** told your affiant during the interview that he lived alone in his apartment and was the sole user of a cellular telephone device that was seized from his person. The particular device was a Samsung Galaxy S21.

On or about January 18th, 2022, a forensic examination was conducted **DRABIC**'s Samsung Galaxy S21 device. Affiant conducted investigative and analytical reviews of the forensic examination reports for the Galaxy S21 device, as well as various other electronic devices seized from **DRABIC**'s residence.

Upon reviewing Galaxy S21 device and the forensic examination report, your affiant specifically observed numerous text message conversations between **DRABIC** and what appeared to be a juvenile female victim (hereinafter, "Juvenile Victim"). Upon further review of text message conversations between **DRABIC** and Juvenile Victim, **DRABIC**, on numerous occasions engaged with Juvenile Victim-1 in what can be described as sexually explicit conversations. During those conversations, **DRABIC** directed Juvenile Victim to perform sexual acts, specifically masturbation, and repeatedly asked her to send him photographs of her engaging in the sexual acts. **DRABIC** instructed Juvenile Victim to send nude images and/or videos via Snapchat. **DRABIC**'s instructions regarding sexual acts were explicit and detailed. On more than one occasion, **DRABIC** sent Juvenile Victim images, via text message, of what appeared to be an erect penis.

The following are samples of a text message conversations between **DRABIC** and Juvenile Victim:

Text Message Example 1 - On or about 9/29/2019 at approximately 4:05:07 AM (UTC+0):

DRABIC: "Yes baby. And I'll show u when I get back. Do you want to be a good girl for daddy?"

Juvenile Victim: "I kinda want to be naughty"

DRABIC: "Do you want daddy to tell you what to do and help you get off?"

Juvenile Victim: "Yes"

DRABIC: "Show daddy how are you right now. And do you have any toys"

Juvenile Victim: "Nope"

DRABIC: "Do you have a hair brush? And send me a pic of you baby"

DRABIC: "Let me see you baby 😊"

Juvenile Victim: "Maybe lol also I can't stop looking at that picture"

Juvenile Victim: "Like holy hell"

DRABIC: "Well send me a few pics and I'll send a better one when I get to the hotel ;)"

DRABIC: "Are you rubbing your pussy?"

Juvenile Victim: "Not yet daddy but im tempted"

DRABIC: "Start running your finger over the lips. And let me see"

Juvenile Victim: "Maybe lol I trust u I just dont want to send sexual things just yet"

DRABIC: "I wont share them baby. You've seen me"

DRABIC: "Did you rub"

DRABIC: "Are you playing"

DRABIC: "Are you ok baby?"

Juvenile Victim: "Sorry I fell asleep"

Text Message Example 2 – On or about 9/29/2019 at approximately 12:36:58 PM (UTC+0):

DRABIC: "Do you know what your clit is"

Juvenile Victim: "Yeah"

DRABIC: "Try rubbing that a bit"

DRABIC: "And can you send me some pic of you rn lol"

Juvenile Victim: "Holy hell that feels good and maybe lol"

DRABIC: "Playing with your clit?"

Juvenile Victim: "Yes"

DRABIC: "Try dipping another finger into your pussy while you are playing with your clit"

Juvenile Victim: "One hand or two"

DRABIC: "One hand"

Juvenile Victim: "Ok"

DRABIC: "One finger on the clit, stick a different one in your pussy"

DRABIC: "And let me see u baby 😊"

Juvenile Victim: "Ngl it feels really good and depends"

DRABIC: "And take the finger that in your pussy and wiggle it around"

DRABIC: "Depends on what"

Juvenile Victim: "Oh my I don't know what to say"

DRABIC: "Because of the feeling?"

Juvenile Victim: "Yeah 😊"

DRABIC: "Did you cum"

Juvenile Victim: "Lol it's been like 2 minutes"

DRABIC: "Some girls are quick lol"

Juvenile Victim: "Lol I'm not"

DRABIC: "You can change up the pressure and rhythm on your clit to help"

DRABIC: "And can I see u baby"

Juvenile Victim: "Lol maybe and what does that mean"

DRABIC: "Like you can try pressing on it softer or harder"

DRABIC: "And change how fast you rub it"

DRABIC: "To find what feels best"

DRABIC: "And please 😘 😘"

Juvenile Victim: "Ooo ok and maybe I'll be back I wanna see how long it takes me to cum"

DRABIC: "Ok well let me see something while I wait to find out lol"

Juvenile Victim: "Lol what do you wanna see tho"

DRABIC: "I mean your boobs or your finger on your pussy"

DRABIC: "If that would be ok? I will be the only one to ever see"

Juvenile Victim: "Maybe lol but fr brb I can't wait"

DRABIC: "Snap a pic real quick baby"

DRABIC: "Please do it for daddy?"

Juvenile Victim: "🤔 maybe"

DRABIC: "Please baby"

DRABIC: "I wanna see your beautiful self"

Juvenile Victim: "Maybe but I'm serious I can't wait 😂 😊"

DRABIC: "Well take a pic real quick so I can see how you're playing"

DRABIC: "Then cum for daddy like you're cumming all over my cock"

Juvenile Victim: "Oh my that helped"

Text Message Example 3 - On or about 09/29/2019 at approximately 1:20:18 PM (UTC+0):

DRABIC: "Do you want to do it again tonight? I can call you and instruct you over the phone"

DRABIC: "Phone"

DRABIC: "And will you take a few pics please baby"

DRABIC: "Let daddy see his baby"

Juvenile Victim: "Lol maybe"

DRABIC: "I'm sorry I just wish i could see"

DRABIC: "Do you not trust me?"

DRABIC: "I promise I will be the only one to ever see"

Juvenile Victim: "But if that gets put it could be considered child pornography"

Juvenile Victim: "Since I'm not 18"

DRABIC: "I promise it will not get out"

DRABIC: "If it makes you feel better I'll delete it from my text chat 24 hours after?"

Juvenile Victim: "Idk"

DRABIC: "And I'll send you screenshots to prove it?"

Juvenile Victim: "Maybe"

Text Message Example 4 - On or about 9/29/2019 at approximately 12:14:21 PM (UTC+0):

DRABIC: "Oh lol you're actually out of bed? And btw can you delete those pics I texted from the convo"

DRABIC: "Dont need your mom seeing them lol"

Juvenile Victim: "Lol will do sir"

DRABIC: "You can just call me daddy lol"

DRABIC: "Do you want me to just send them on snap?"

Juvenile Victim: "Sure I guess"

Text Message Example 5 - On or about 10/14/2019 at approximately 11:12:21 PM (UTC+0):

DRABIC: "Sorry, I should just go"

Juvenile Victim: "No don't I just don't think you should get mad when I don't send you pictures of me in a sexual way"

Juvenile Victim: "I'd never get mad at you for not sending those types of pictures"

DRABIC: "It's nothing to do with that."

Juvenile Victim: "Okay"

DRABIC: "I'm mad because you made me a promise and dont give one shit that you broke it. It has nothing to do with the pictures themselves."

DRABIC: "It has to do with the fact that you lie over and over"

Text Message Example 6 - On or about 9/29/2019 at approximately 5:15:44 PM (UTC+0):

DRABIC: "Same. Did you delete our text convo earlier"

Juvenile Victim: "Yeah lol"

DRABIC: "Does your mom go thru your phonr"

Juvenile Victim: "No"

DRABIC: "Then why did you delete it"

Juvenile Victim: "Lol I thought you wanted me to"

DRABIC: "No lol"

DRABIC: "Just the pics"

Text Message Example 7 - On or about 9/29/2019 at approximately 10:13:58 PM (UTC+0):

DRABIC: "Can ur mom see ur phone"

Juvenile Victim: "No why"

DRABIC: "That's why lol"

Juvenile Victim: "Ahh lol I wasn't expecting that"

DRABIC: "Is it ok? Lol"

Juvenile Victim: "Yes lol"

DRABIC: "Ok lol. When will u be home"

Juvenile Victim: "Soon"

DRABIC: "Ok. Will you snap me when you're gonna shower? That way you dint have to worry about them being saved either lol"

Juvenile Victim: "Maybe lol also I have a serious question"

DRABIC: "Ask anything"

Juvenile Victim: "So like if we do eventually meet and hit it off will our relationship just be sex"

DRABIC: "Oh hell no. I'm gonna take you on dates and all sorts of stuff"

Juvenile Victim: "Ooo ok"

Affiant believed **DRABIC** was well aware that Juvenile Victim was in fact underage due to various statements made by Juvenile Victim about being under the age of eighteen, as well as numerous contextual references of Juvenile Victim being of high school age. In text message conversations with **DRABIC**, Juvenile Victim discussed with **DRABIC** various topics such as issues with grades, a typical high school class, such as algebra, graduation anticipation, college preparation, high school disciplinary action such as In School Suspension, aka: ISS, as well as statements made by Juvenile Victim about her being grounded by parents.

The language used by **DRABIC** appeared to included statements of deceit, control, and manipulation typically used by a juvenile sex predator. **DRABIC** directed conversations with Juvenile Victim to convert from general flirting discussion into discussions about knowledge of sexual acts and sexual experience. Juvenile Victim appeared to be apprehensive or resistant to

DRABIC's regular requests to send explicit images and videos, however **DRABIC**'s demands were continually insistent.

The following are additional samples of a text message conversations between **DRABIC** and Juvenile Victim:

Text Message Example 8 - On or about 9/30/2019 at approximately 1:02:09 PM (UTC+0):

DRABIC: "Well what time does school get out"

Juvenile Victim: "2:35

DRABIC: "What if on Thursday I picked you up? We could hang for a but then I'd take you home before your mom got home"

Text Message Example 9 - On or about 2/1/2020 at approximately 12:49:54 AM (UTC+0):

Juvenile Victim: "i'm not even 18"

DRABIC: "Are they still growing"

DRABIC: "And can you go back to the bathroom and take a Pic for me ☺"

Affiant was able to locate identifiers and contact information for the Juvenile Victim, and subsequently contacted family members in order to confirm Juvenile Victim's identity and age at the time of suspected victimization. Juvenile Victim was born on XX/XX/2006. The text message conversation involving **DRABIC** and Juvenile Victim, from which excepts are included above, continued until approximately January 7, 2022.

On or about January 27th, 2022, Juvenile Victim was interviewed by an FBI Child/Adolescent Forensic Interviewer (CAFI). Juvenile Victim informed FBI CAFI she

engaged in traditional text message conversations, as well as communicated via Snapchat, with a male she knew only as "Andy." Juvenile Victim positively identified **DRABIC**, from a Department of Motor Vehicles image, as the same person she knew as "Andy." Juvenile Victim told the FBI CAFI that she communicated with **DRABIC** via the following Snapchat username profiles: "akrox23" and "andyd6627."

Juvenile Victim informed the FBI CAFI that she was instructed by **DRABIC**, on more than one occasion, to send images and/or videos of herself that were nude and/or sexual in nature. Juvenile Victim informed the FBI CAFI that she did, on more than one occasion, transmit images and/or videos of herself, both nude and/or sexual in nature, to **DRABIC** from her Snapchat profile to **DRABIC**'s profile(s). Based on the context of the statements made Juvenile Victim and as well as the date range of the text message conversation, the Affiant believes the Juvenile Victim was between the ages of 13 and 15 when **DRABIC** instructed her to send images and/or videos of herself.

Based on the foregoing facts, Affiant has probable cause to believe that **DRABIC** has engaged in Attempted Sexual Exploitation of Children, in violation of Title 18, United States Code, Section 2251(a).



Timothy E. Edquist, Special Agent
Federal Bureau of Investigation
Akron, Ohio

SUBSCRIBED AND SWORN TO ME THIS 17th DAY OF FEBRUARY 2022 VIA TELEPHONE AFTER SUBMISSION BY RELIABLE ELECTRONIC MEANS. FED. R. CRIM. P. 4.1 AND 41(d)(3).



Amanda M. Knapp
U.S. Magistrate Judge

